

POWER & ASSOCIATES, P.C.
By: Michael Power, Esquire
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Attorney for Debtor, Michele Freeman

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In Re:	:	Chapter 13
Michele Freeman fna Michele	:	
Salmonese fna Michele Freeman	:	CASE NO. 17-18265 (MBK)
Salmonese dba Industrial Steam Cleaning:	:	
of N.J., LLC dba Industrial Steam	:	Judge: Michael B. Kaplan
Cleaning of New Jersey	:	
	:	
Debtor.	:	Hearing Date: February 6, 2018 at 10:00
	:	
	:	
	:	

**CERTIFICATION IN OPPOSITION TO MOTION OF AMBOY BANK FOR RELIEF
FROM THE AUTOMATIC STAY**

I, Michael Power, Esq., of full age, being duly sworn according to law upon my oath,
depose and say:


1. I am an attorney-at-law in the State of New Jersey and I am fully familiar with the facts of this matter. I have represented the debtor since the commencement of this action.
2. I have discussed the motion for relief with the debtor and debtor advises she intends to cure all post-petition arrearages owed the movant by the return date of plaintiff's motion for relief.

3. Debtor further intends to file a feasible and confirmable Chapter 13 Plan in advance of the confirmation date of February 13, 2018.

4. As such, plaintiff requests that movant's motion for relief from the automatic stay be denied.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

POWER & ASSOCIATES, P.C.



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ORDER

AND NOW, this ____ day of February, 2018, upon Movant's Motion for Relief and Debtor's Opposition to such motion, it is hereby ordered that the motion is denied.

Michael B. Kaplan
U.S. Bk. Judge

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CERTIFICATE OF SERVICE

I, Michael Power, do hereby certify that I have served a copy of Debtor's response in opposition to motion for relief to the following individual via electronic mail and first class mail, postage prepaid:

Elizabeth K. Holdren, Esq.
Hill Wallack LLP
21 Roszel Road
P.O. Box 5226
Princeton, New Jersey 08543

Albert Russo
Standing Chapter 13 Trustee
CN 4853
Trenton, NJ 08650-4853



Michael Power, Esq.